

REMARKS

Rejections under 35 U.S.C. § 103

On page 2 of the Office Action, the Examiner has rejected claims 1-5, 7-21 and 23-27 under 35 U.S.C. § 103(a) as being unpatentable over Bright et al. (6,558,191).

Applicants respectfully traverse the rejections. At the outset, there is no motivation within the reference to combine it with other knowledge in the art at the time the invention was made. Bright et al. discloses a stacked transceiver receptacle assembly including a plurality of first transceiver receptacles mounted on one side of the intermediate circuit board, a plurality of second transceiver receptacles mounted on an opposite side of the intermediate circuit board and an electrically conductive bezel spacer that is disposed in gaps between shielding cages of the first and the second transceiver receptacles. Specifically, this construction allows for the bezel spacer 36 to be engaged by resilient ground tabs 44 of the shielding cages 16, thereby frictionally retaining the bezel spacer between the shielding cages and providing a common ground path between all of the shielding cages.

The Examiner states that it would be obvious to take the stacked transceiver receptacle assembly of Bright et al. with the knowledge of one skilled in the art at the time the invention was made to arrive at Applicants' invention (Office Action, page 3). However, there is no motivation to seek an improvement in the stacked transceiver receptacle assembly of Bright et al., which discloses pluralities of transceiver receptacles and an electrically conductive bezel spacer that is disposed in gaps between shielding cages of the pluralities of transceiver receptacles. In particular, Bright et al. fails to disclose a monolithic housing defining at least two ports or pluralities of transceiver receptacles in a single housing arrangement in the shielding cage 16. Thus, there is no motivation to combine the stacked transceiver receptacle assembly of

Bright et al. with the knowledge of one of ordinary skill in the art at the time the invention was made, as the combination would result in a stacked transceiver receptacle assembly that is contrary to the disclosure of Bright et al. Bright et al. only teaches a plurality of transceiver receptacles in *separate* shielding cages and an electrically conductive bezel spacer that is disposed in gaps between *separate* shielding cages of the pluralities of transceiver receptacles. Therefore, this reference teaches away from the result the Examiner states would obviate the invention.

Further, Applicant submits that the stacked transceiver receptacle assembly of Bright et al. would result in pluralities of transceiver receptacles that lack a monolithic housing defining at least two transceiver receptacles. Therefore, Bright et al. fails to provide a disclosure for a monolithic housing and does not provide sufficient disclosure for providing a single shielding cage with pluralities of transceiver receptacles arranged therein. Applicants' invention, and specifically the combined use of a monolithic housing defining at least two ports and an electrical connector mountable within the second end, the electrical connector disposed within the cut-out portion of the base so that upon mounting of the multi-port receptacle to a motherboard the electrical connector is colinear with the passageway, shows a dramatically distinct multi-port receptacle when compared with the stacked transceiver receptacle assembly disclosed in Bright et al.

Even if this reference was properly combinable, Bright et al. alone or in combination with the knowledge of one of ordinary skill in the art at the time the invention was made does not disclose or render obvious Applicant's invention. Specifically, the combination of this reference and the reasons given by the Examiner for the combination do not disclose what is required by the Applicant's claims – a monolithic housing defining at least two ports and an electrical

connector mountable within the second end, the electrical connector disposed within the cut-out portion of the base so that upon mounting of the multi-port receptacle to a motherboard the electrical connector is colinear with the passageway. This combination also does not teach or suggest a transceiver receptacle assembly expressly or inherently having the claimed requirements of Applicants' multi-port receptacle. It is advantageous to provide a multi-port receptacle that has a monolithic housing defining at least two ports and has an electrical connector disposed within the cut-out portion of the base so that upon mounting of the multi-port receptacle to a motherboard the electrical connector is colinear with the passageway. One advantage to using the multi-port receptacle of the present invention is that fewer mounting pins/posts are required to be connected with ground paths. (Page 12, lines 10-17).

Another advantage is that *separate* shielding cages and an electrically conductive bezel spacer - such as disclosed by Bright et al. - are not part of Applicants' claimed invention. The stacked transceiver receptacle assembly of Bright et al. could not be used to provide a single shielding cage to house a plurality of transceiver receptacles of Applicants' invention. Subsequent elimination of the electrically conductive bezel spacer of Bright et al. - resulting from the use of a multi-port receptacle including a monolithic housing defining at least two ports and an electrical connector mountable within the second end, the electrical connector disposed within the cut-out portion of the base so that upon mounting of the multi-port receptacle to a motherboard the electrical connector is colinear with the passageway would also not have been obvious in view of Bright et al. Thus the stacked transceiver receptacle assembly of Bright et al. is unsuitable to Applicants' invention.

The Examiner has failed to establish a prima facie case for obviousness of claims 1-5, 7-21 and 23-27. It is the Examiner's burden to show that the prior art relied upon coupled with the

knowledge generally available in the art at the time of the invention must contain a suggestion or incentive that would have motivated one of ordinary skill in the art to combine references. As Applicants have set forth throughout this response, the distinctive differences between the individual references makes the stated rejection implausible. The Examiner must also show that the proposed combination must have a reasonable expectation of success. It is inappropriate for the Examiner to use the present application as a motivation to combine the references. This inappropriate combination, taking bits and pieces from each reference in an attempt to create Applicants' invention, is exactly what the Examiner has done in order to support the rejection.

Therefore, since Bright et al. fails to teach or suggest a multi-port receptacle including a monolithic housing defining at least two ports and an electrical connector mountable within the second end, the electrical connector disposed within the cut-out portion of the base so that upon mounting of the multi-port receptacle to a motherboard the electrical connector is colinear with the passageway, Applicants respectfully submit Bright et al. does not render obvious any of the pending claims.

Thus, Applicants respectfully request reconsideration and withdrawal of the § 103 rejection as to these claims and that all claims 1-27 be moved to allowance.

Respectfully submitted,

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